1 Douglas R. Dollinger (pro hac vice) (NY Bar No. 2354926) Law Offices of Douglas Dollinger 2 50 Main Street Suite 1100 White Plains, NY 10606 3 Telephone: 845-915-6800 Facsimile: 845-915-6801 4 E-mail: ddollingeresq@gmail.com 5 Seth D. Heyman (CA Bar No. 194120CA) 6 **Heyman Law Offices** Suite 900 7 2600 Michelson Drive Irvine, CA 92612 8 Telephone: 855-439-6628 855-407-7714 9 Facsimile: sdh@heymanlegal.com E-mail: 10 Attorneys for Plaintiffs Indiezone, Inc. and eoBuy Licensing Ltd. 11 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 12 SAN FRANSICO DIVISION 13 14 Indiezone, Inc., a Delaware corporation, and EoBuy, Limited an Irish private limited 15 Case No: 3:13-cv-04280 VC company, 16 Plaintiffs. 17 PLAINTIFF'S OPPOSED MOTION FOR vs. AN ENLARGEMENT OF TIME TO 18 Todd Rooke, Joe Rogness, Phil Hazel, Sam REPLY TO DEFENDANTS' RESPONSE Ashkar, Holly Oliver and U.S. Bank, TO MOTION TO AMEND COMPLAINT 19 collectively the **RICO Defendants**; AND DEFENDANTS' RESPONSE TO REQUESTING ANMOTION 20 ENLARGEMENT OF TIME TO SUBMIT Jingit LLC, Jingit Holdings, LLC, Jingit A CORRECTED RESPONSE TO THE Financial Services LLC., Music.Me, LLC., 21 **DEFENDANTS' MOTIONS TO COMPEL** Tony Abena, John E. Fleming, Dan Frawley, ARBITRATION, DISMISS OR STAY 22 Dave Moorehouse II, Chris Ohlsen, Justin THE PROCEEDINGS PURSUANT TO James, Shannon Davis, Chris Karls in their **RULES** LOCAL 6-3. CIVIL 23 capacities as officers, agents and/or employees of Jingit LLC, Defendants in 24 Courtroom: 4, 17th Floor Negligence, and Aiding/Abetting; District Judge Vince Chhabria 25 Wal-Mart, General Electric, Target, DOE(s) 26 and ROE(s) 1 through 10, Defendants in Negligence Secondary-Vicarious 27 Infringement, 28 Defendants.

Plaintiff's Opposed Motion For An Enlargement Of Time To Reply To Defendants' Response To Motion To Amend Complaint And Defendants' Response To Motion Requesting An Enlargement Of Time To Submit A Corrected Response To The Defendants' Motions To Compel Arbitration, Dismiss Or Stay The Proceedings

1 TO THE HONORABLE JUDGE OF SAID COURT: 2 NOW COMES attorney Douglas R. Dollinger with an application requesting an enlargement 3 of time to reply to Defendants' Response to Motion to Amend Complaint [DE 94] and Defendants' 4 Response to Motion Requesting an Enlargement of Time to Submit a Corrected Response to the 5 Defendants' Motions to Compel Arbitration, Dismiss or Stay the Proceedings [DE 97] pursuant to 6 Civil Local Rules 6-3. 7 This motion opposed and is supported by the Declaration of Douglas R. Dollinger. 8 LAW OFFICES OF DOUGLAS R. DOLLINGER Dated: April 30, 2014 9 10 <u>/</u>S/ By: 11 Douglas R. Dollinger (pro hac vice) NY Bar No. 2354926 12 Law Offices of Douglas Dollinger 50 Main Street Suite 1100 13 White Plains, NY 10606 14 Telephone: 845-915-6800 Facsimile: 845-915-6801 15 E-mail: ddollingeresq@gmail.com Attorney for Plaintiffs 16 17 18 19 20 21 22 23 24 25 26 27 28

[PROPOSED] ORDER IT IS HEREBY ORDERED THAT: After duly considering the Plaintiffs' Opposed Motion for an enlargement of time to reply to Defendants' Response to Motion to Amend Complaint [DE 94] and Defendants' Response to Motion Requesting an Enlargement of Time to Submit a Corrected Response to the Defendants' Motions to Compel Arbitration, Dismiss or Stay the Proceedings[DE 97] pursuant to Civil Local Rules 6-3, the Court finds good cause exists and the Motion is hereby GRANTED. Plaintiffs time to reply is enlarged to May 7, 2014. Dated: April ____, 2014 District Judge Vince Chhabria

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2014, I electronically filed the foregoing document with the Clerk of the Court by using the ECF system for filing and served the Counsel appearing for all parties to these proceedings.

/S/ Douglas R. Dollinger, Esq. Pro Hoc Vice Bar No. NY 2354926 Law Office of Douglas R. Dollinger, P.C. & Associates 50 Main Street-Suite 1000 White Plains, New York 10924 Telephone: (845) 915-6800

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